

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Improving Spectrum Efficiency Through)	WT Docket No. 12-64
Flexible Channel Spacing and Bandwidth)	
Utilization for Economic Area-based 800)	
MHz Specialized Mobile Radio Licensees)	
)	
Request for Declaratory Ruling that the)	WT Docket No. 11-110
Commission's Rules Authorize Greater)	
than 25 kHz Bandwidth Operations in the)	
817-824/862-869 MHz Band)	

To: The Commission

COMMENTS OF SOUTHERN COMPANY SERVICES, INC.

Southern Company Services, Inc. ("Southern") hereby submits these Comments in support of the Commission's proposals in the *Notice of Proposed Rulemaking* in this proceeding to allow larger than 25 kHz bandwidth operations in the 800 MHz Enhanced Specialized Mobile Radio Service ("ESMR") band.¹

I. Introduction

Southern is a wholly-owned subsidiary service company of Southern Company, a super-regional energy company in the Southeast United States. Southern Company also owns four

¹ Improving Spectrum Efficiency Through Flexible Channel Spacing and Bandwidth Utilization for Economic Area-based 800 MHz Specialized Mobile Radio Licensees; Request for Declaratory Ruling that the Commission's Rules Authorize Greater than 25 kHz Bandwidth Operations in the 817-824/862-869 MHz Band, WT Docket Nos. 12-64, 11-110, *Notice of Proposed Rulemaking*, FCC 12-25 (rel. Mar. 9, 2012) ("*NPRM*"). The *NPRM* was published in the Federal Register at 77 Fed. Reg. 18991 (March 29, 2012).

electric utility subsidiaries – Alabama Power Company, Georgia Power Company, Gulf Power Company, and Mississippi Power Company – which provide retail and wholesale electric service throughout a 120,000 square mile service territory in Georgia, most of Alabama, and parts of Florida and Mississippi. Southern is obligated to its employees and to the general public to conduct its operations in a safe manner and to maintain the reliability of its utility services. Members of the Southern Company family use a variety of communications technologies to support the safe and efficient delivery of energy services to their customers. In this regard, Southern and its operating company affiliates rely on utility-grade mobile communications services provided by SouthernLINC Wireless for voice, dispatch, and data communications. As the largest user of the SouthernLINC Wireless system, Southern has an interest in the types of services and technologies that SouthernLINC Wireless is able to deploy to support Southern’s electric utility operations. Southern also submitted Reply Comments in support of the Petition for Declaratory Ruling that was filed by Sprint Nextel Corporation and which formed the basis for the proposals in the *NPRM*.²

II. Authorizing Wider Bandwidths at 800 MHz Will Promote Spectrum Efficiency and Development of New Services

Southern has enjoyed highly reliable mobile communications service from SouthernLINC Wireless. SouthernLINC Wireless designed its network from the ground up to meet the needs of its electric operating company affiliates, and this network has proven itself to be highly resilient and reliable even during the most severe weather events. When the SouthernLINC Wireless network was originally designed it was optimized for use of non-

² See Reply Comments of Southern Company Services, Inc., filed August 16, 2011, in WT Docket No. 11-110.

contiguous 25 kHz channels with Motorola's proprietary Integrated Digital Enhanced Network ("iDEN") technology. This technology has served Southern's need for voice and low-speed mobile data services very well. However, Southern foresees an increasing need for higher speed mobile data services and additional applications that might not be readily supported by the current platform used by SouthernLINC Wireless.

With the recent consolidation of SouthernLINC Wireless's channels into contiguous spectrum blocks, the company has the potential to deploy newer technologies that will make more efficient use of its spectrum and offer more innovative services to Southern's electric company affiliates. Southern understands that a number of newer technologies are potentially available to SouthernLINC Wireless that would allow it to offer mobile broadband services, which are increasingly needed by Southern's operating companies in the provision of electric utility service to the public. Both Congress and the Commission have recognized the public interest benefits in wider availability of new technologies, including wireless broadband.³

Southern agrees with statements in the *NPRM* that the Commission intended to provide EA-based 800 MHz licensees with discretion over channelization within their assigned channel blocks, but the Commission failed to revise the existing channelization scheme and bandwidth limitations in Section 90.209 of the Commission's Rules.⁴ Southern therefore commends the Commission for proposing to correct the rules so that EA-based licensees in relevant portions of the 800 MHz band are no longer constrained by legacy channel spacing and bandwidth limitations. Adoption of these modest, but significant, rule changes will allow SouthernLINC

³ See, e.g., 47 U.S.C. §303(y) (authorizing the FCC to allocate spectrum so as to provide flexibility of use); 47 U.S.C. §157 (expressing the policy of the United States to "encourage the provision of new technologies and services"); and "Connecting America: The National Broadband Plan," Recommendation 4.1 (the FCC should make more spectrum available for wireless broadband).

⁴ *NPRM*, para. 4.

Wireless and other licensees in the 800 MHz ESMR band to offer new and innovative services using broadband channels.

III. Conclusion

Southern supports the Commission's proposed amendments to Section 90.209(b) of its Rules to permit EA-based systems in the 800 MHz band to aggregate channels into larger bandwidths while providing additional protection for 800 MHz public safety licensees.

Adoption of these rule changes will allow SouthernLINC Wireless and Southern to investigate potential opportunities to employ technologies that will require bandwidths larger than 25 kHz. Southern therefore respectfully requests that the Commission expeditiously adopt these proposals.

Respectfully submitted,

SOUTHERN COMPANY SERVICES, INC.

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